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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re Chapter 11

SquareTwo Financial Services Corporation, *et al.* Case No. 17-10659 (JLG)

Jointly Administered
Debtors.¹

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**JOINT NOTICE OF WITHDRAWAL OF
(I) MOTION OF TRANSTAR SOFTWARE, LLC TO APPROVE ITS
LATE FILING *NUNC PRO TUNC* AND (II) THE MOTION OF THE SQUARETWO
UNSECURED CREDITOR DISTRIBUTION TRUST DEEMING CERTAIN CLAIMS
TO BE NON-BENEFICIARIES AS TO THE CREDITOR TRANSTAR SOFTWARE LLC**

WHEREAS, on April 18, 2018, Transtar Software LLC (“Transtar”) filed its *Notice of Motion of Creditor Transtar Software, LLC to Approve its Late Filing Nunc Pro Tunc* [Docket No. 666] (the “Transtar Motion”)² seeking an order from the Court allowing its late filed claim.

¹ The Debtors that commenced the chapter 11 cases and the last four digits of each such Debtor’s federal taxpayer identification number and/or Canadian equivalent are as follows: Astrum Financial, LLC (2265); Autus, LLC (2736); CA Internet Marketing, LLC (7434); CACH, LLC d/b/a Fresh View Funding (6162); CACV of Colorado, LLC (3409); CACV of New Jersey, LLC (3499); Candeo, LLC (2809); CCL Financial Inc. (7548); Collect Air, LLC (7987); Collect America of Canada, LLC (7137); Healthcare Funding Solutions, LLC (2985); Metropolitan Legal Administration Services, Inc. (6811); Orsa, LLC (2864); Preferred Credit Resources Limited (0637); ReFinance America, Ltd. (4359); SquareTwo Financial Canada Corporation (EIN: 1034; BN: 0174); SquareTwo Financial Corporation (1849); and SquareTwo Financial Services Corporation d/b/a Fresh View Solutions (5554).

² The Transtar Motion was filed multiple times due to a clerical error. *See Notice of Motion of Creditor Transtar Software, LLC to Approve Its Late filing Nunc Pro Tunc* [Docket Nos. 659 and 666]; *Memorandum of Law of AFDOCS/17008739.1*

WHEREAS, on May 25, 2018, the Creditor Distribution Trust filed its *Motion of the SquareTwo Unsecured Creditor Distribution Trust Deeming Certain Creditors to be Non-Beneficiaries* (the “Non-Beneficiary Motion”) [Docket No. 687].

WHEREAS, on July 3, 2018, the Court entered its *Order Deeming Certain Creditors to be Non-Beneficiaries of the Creditor Distribution Trust* [Docket No. 725] (the “Order”) granting the Non-Beneficiary Motion except as to certain creditors, including Transtar.

WHEREAS, the SquareTwo Unsecured Creditor Distribution Trust (the “Creditor Distribution Trust”) and Transtar have consensually resolved the Transtar Motion and the Non-Beneficiary Motion.

PLEASE TAKE NOTICE that the Creditor Distribution Trust, by its counsel, Arent Fox LLP, hereby withdraws the Non-Beneficiary motion solely with respect to the claim of Transtar.

PLEASE TAKE NOTICE that Transtar, by its counsel, Bressler, Amery & Ross, P.C., hereby withdraws the Transtar Motion.

Dated: October 2, 2018
New York, New York

ARENT FOX LLP

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Creditor Transtar Software, LLC in Support of its Motion to Approve its Late Filing Nunc Pro Tunc [Docket No. 660 and 664]; *Affidavit of Benjamin Goldfield* [Docket No. 661]. Docket No. 666 is the operative pleading.